

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

L. Lin Wood, Jr.,

Plaintiff,

v.

Brad Raffensperger, in his official capacity
as Secretary of the State of Georgia, et al.,

Defendants.

CIVIL ACTION FILE NO.
20-cv-04651-SDG

AFFIDAVIT OF SHARON ZYDNEY

Personally appeared before me, the undersigned subscribing officer, duly authorized to administer oaths, Sharon Zydney, who being duly sworn, deposed and stated as follows:

1. My name is Sharon Zydney. I am over 18 years of age, a citizen of the State of Georgia, suffer from no legal disabilities, and am otherwise competent to testify to the matters contained herein. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.

2. I am a resident of and registered elector in Fulton County, Georgia.

3. On November 16, 2020, I was present as an observer credentialed by the Democratic Party of Georgia to observe the statewide hand recount of ballots cast in the 2020 Presidential Election in Henry County, Georgia (the "Recount").

4. I arrived at 526 Industrial Boulevard, McDonough, Georgia where the Recount was held, at approximately 6:50 a.m.

5. On arrival, I was greeted by Ameika Pitts, Henry County Elections Director, who I recognized from the training I attended the previous Friday. I had with me the certified letter from the Democratic party that I was eligible to observe the Recount. I also took an oath before being allowed on the floor to observe.

6. At the training I had been told that observers were not allowed to have cell phones in the Recount area. I also observed signs in the Recount area stating no cell phones.

7. I was one of 2 Democratic observers joined by 2 Republican observers inside the rope where tables were set up for the recount. There were approximately 6 tables with 3 stations per table and 2 counting officials (auditors) at each station. There were approximately 12 teams of auditors during my time on the floor, with another team of auditors coming in around 11:00. The four observers, two from each party, were allowed to move amongst the tables where

the Recount was happening and observe the Recount. There were also 2 additional observers from each party assigned to the vote review panels.

8. After 8:00 a.m., additional observers with credentials from the Democratic party arrived and observed from behind the rope. There were also observers whose party affiliation was not obvious. As the morning went on, some Democrat certified observers did leave, and some individuals remained in the public viewing area behind the rope.

9. At approximately 11:00 a.m., the 2 Republican observers were replaced by 2 other Republican observers. At one point, all 4 were within the rope. The other Democratic observer working with me switched out with a Democratic observer who had been behind the rope.

10. While I was observing the Recount, an individual in the back called Ms. Pitts over claiming there was an urgent issue. I heard that one ballot had been put in the wrong pile and it sounded like it was a Trump ballot put in the Biden pile. Ms. Pitts came over and I watched as the auditors re-did the sorting for this pile of votes. Indeed one ballot was in the wrong pile and they found it and corrected the mistake when they re-counted the batch.

11. I also observed one audit team get out of sync when placing their ballots into piles. One woman was orally calling out the vote and the other person

was then orally calling out the vote and placing them in the appropriate pile. In the middle of the batch she started putting Biden ballots on the Trump pile and Trump ballots on the Biden pile. I called over a county election official who had the two counters redo the entire batch of ballots. I watched them redo and recount and it was corrected. I do not believe the mix up was intentional.

12. To me, the system for counting and observing was working as it was intended; when mistakes were made by human error, then those mistakes were corrected.

13. In my interactions with Ms. Pitts I found her friendly and welcoming. She did become focused and serious if a problem was identified. I would not characterize her behavior as hostile but attentive and matter-of-fact if a problem was brought to her attention.

14. A little after 1:00 p.m., after approximately 6 hours of observation, I left the Recount.

15. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.

16. I declare under penalty of perjury that the foregoing is true and correct to the best of my ability.

Executed this 19th day of November 2020.

Sharon Zydney (signed)
Sharon Zydney

Sworn to and subscribed to
before me this 19th day of
November 2020.

Laura Tucker
Notary Public



My commission expires: March 28, 2023